

EXHIBIT 22
FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,)
)
Plaintiffs,) Case No.
v.) 4:20-cv-00957-SDJ
)
GOOGLE LLC,) Hon. Sean D. Jordan
)
Defendant.)

HIGHLY CONFIDENTIAL
PURSUANT TO PROTECTIVE ORDER

— — —
THURSDAY, MAY 23, 2024
— — —

Videotaped Deposition of [REDACTED],
taken pursuant to notice and conducted at Norton Rose
Fulbright US LLP, 1301 Avenue of the Americas, Room 30-C,
New York, New York, commencing at 9:34 a.m., EDT, on the
above date, before Jennifer A. Dunn, Registered Merit
Reporter, Certified Realtime Reporter, Missouri Certified
Court Reporter, and Certified Shorthand Reporter in
California, Illinois, and Texas #12050.

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RAY MOORE - Trial Technician

CHRIS RITONA - Videographer

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1

[REDACTED]

2

Q Okay. In just looking at the custodians on the first page that had this document in their files, does that --

3

4

A What does custodian mean here?

5

6

Q This means -- or do you understand that in this case Google produced documents from certain people's files, and those people would be custodians?

7

8

A Oh, interesting.

9

Q Do you understand that?

10

11

A So in some sense these people like had a copy of it or had it in their files or something? That's weird.

12

13

Q Does this custodian list reflect your testimony that you would have send your document out to a broader distribution?

14

15

A Sure, yeah. I would have -- the distribution I sent it to, all of these people would have received it, yeah.

16

17

Q Okay. Did you ever discuss any of your concerns that we've discussed today in Google Chat or any other form of internal instant messaging?

18

19

A Maybe.

20

Q Did you use Google Chat?

21

A I don't remember, probably some. I don't -- I

22

really don't remember.

1 Q You don't remember using Google Chat to chat
2 teammates or others in Google?

3 A I think we were mostly e-mail heavy, but maybe
4 there was chat, too. I don't remember.

5 MS. YOUNG: Can we mark document 12, which is
6 a subpoena to [REDACTED], as the next exhibit?

7 It's going to be -- is it 314?

8 (Burchett Exhibit 315 marked for
9 identification.)

10 BY MS. YOUNG:

11 Q [REDACTED] you testified earlier that you
12 recalled reviewing these topics that start near the end of
13 the document in Exhibit A?

14 A Yeah, there's a lot of them.

15 Q Is there anything that -- in these topics that we
16 did not cover today that you would like to testify about?

17 MR. JUSTUS: Objection. Form.

18 THE WITNESS: You didn't bring up Jedi. I
19 don't know anything about Jedi, it happened after. I
20 know a little bit about it, but I do remember after I
21 had been in maps for, I don't know, eight months or so,
22 I just visited my old team, and somebody was like:
23 "Oh, did you hear about Jedi?"

24 And I was like: "No."

25 And they're like: "You're really not going

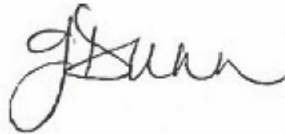
CERTIFICATE

I, Jennifer A. Dunn, Registered Merit Reporter,
Certified Realtime Reporter, Certified Shorthand Reporter,
and Certified Court Reporter, do hereby certify that prior
to the commencement of the examination, [REDACTED]

[REDACTED], was duly remotely sworn by me to testify to the
truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim
transcript of the testimony as taken stenographically by me
at the time, place and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor
employee nor attorney nor counsel of any of the parties to
this action, and that I am neither a relative nor employee
of such attorney or counsel, and that I am not financially
interested in the action.



"/s/JENNIFER A. DUNN"

NCRA Registered Merit Reporter

NCRA Certified Realtime Reporter

California Certified Shorthand Reporter #14461

Illinois Certified Shorthand Reporter #084.004939

Missouri Certified Court Reporter #485

Texas Certified Shorthand Reporter #12050

Dated: May 23, 2024